

July 12, 2023

Honorable Christine P. O'Hearn  
United States District Judge  
Mitchell H. Cohen Building  
& U.S. Courthouse  
4th & Cooper Streets  
Room 1050  
Camden, NJ 08101

RE: Plaintiff's letter in follow up to July 7, 2023 oral argument hearing

Dear Judge O' Hearn,

Thank you to Your Honor and Your Honor's staff for the diligent review of the moving papers and the order entered by the Court on July 7, 2023. I provide herein an update from related litigation as it has an impact on the case at bar before Your Honor.

The Court and Counsel for Defendant NJPen Media Group, LLC are very well aware that the moving papers in the case at bar parties refer to a certain lawsuit the Camden Vicinage of the Superior Court of New Jersey. (Young v. McBride et al. 2021-L-1724) before the Honorable Steven Polansky. In the case before Judge Polansky, Plaintiff McBride and Plaintiff Blissick are represented by Hagner and Zohlman, LLC of Cherry Hill, NJ adverse to two men: Corey Reuss and Paris Young. Mr. Young and Mr. Reuss are not parties to the case before Your Honor.

As described in moving papers in *this* instant case at bar, Mr. Young and Mr. Reuss were deposed in the case before Judge Polansky in the Superior Court of New Jersey. Mr. Reuss and Mr. Young were also sources of information for the articles written by Defendant NJPen Media Group. Quite literally an hour after oral argument concluded before Your Honor, I received word, through Mr. Zohlman, that Mr. Reuss will be retracting his statements to Defendant NJ Pen and doing so in writing.

This retraction has an impact on the instant case at bar before Your Honor. Setting aside any claims that remain in the case at bar or that could be brought in an amended complaint, the simple fact is that a "news" story is no longer valid if the source retracts statements made and belied by a sworn deposition,.

As such, it is patently pathetic for Defendant to waste the time of Your Honor, Your Honor's staff, and the Court as a whole when the removal of the articles now comes down to journalistic integrity of Defendant NJPen as an entity. Defendant's sources were discredited in sworn depositions and now have agreed to retract their statements to Defendant NJPen. For a firm like Archer and Griener, a firm with a long and storied reputation as an ethical law firm, to not continue discussions to resolve the matter would be asinine.

When I received word that non-party Cory Reuss agreed to retract his statements to NJ Pen, I did immediately and via electronic mail alert Mr. Terlingo to these developments as they may impact their client's decisions with regard to filing deadlines established by Your Honor's order dated July 7, 2023. I am very sad to say that I have not heard so much as one word from Mr. Terlingo regarding these developments.

Thank you again for the Court's diligent attention to this matter.

Very truly yours,

Brian McBride  
Plaintiff pro se